



State of New Jersey

PHILLIP D. MURPHY
Governor

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Site Remediation and Waste Management Program
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CATHERINE R McCABE
Commissioner

SHEILA Y. OLIVER
Lt. Governor

Pat Evangelista, Acting Director
Superfund and Emergency Management Division
U.S. Environmental Protection Agency Region II
290 Broadway
New York, NY 10007-1866

October 18, 2019

RE: Sherwin-Williams/Hilliards Creek Superfund Site, Former Manufacturing Plant
Gibbsboro, Camden County, New Jersey
PI No. G000004382, EA No. RPC000005

Dear Mr. Evangelista:

The New Jersey Department of Environmental Protection (Department) has reviewed the Proposed Plan for the Sherwin-Williams/Hilliards Creek Superfund Site, Operable Unit (OU) 2, prepared by the U.S. Environmental Protection Agency (EPA) Region II, which addresses soil, sediments, surface water and light non-aqueous phase liquid (LNAPL) at the Former Manufacturing Plant (FMP) and the upper portion of Hilliards Creek.

The Preferred Alternative includes:

- Excavation and off-site disposal of contaminated soils and LNAPL-impacted soils, backfill and restoration of excavation areas, with installation of capping system, and establishment of institutional controls, as needed.
- Installation of LNAPL recovery system and bioremediation injection system to stimulate ongoing LNAPL biodegradation.
- Installation of a soil gas extraction system to mitigate impacts due to LNAPL biodegradation.
- Installation of a LNAPL recovery trench to prevent LNAPL transport into areas undergoing excavation.
- Sediment excavation and surface water monitoring of Upper Hilliards Creek.

The Department acknowledges that residential properties (OU1) were addressed by the September 2015 Record of Decision (ROD) and that in the future, OU's will address groundwater contamination (OU3), and the remaining portions of Hilliards Creek, Kirkwood Lake, and Silver Lake (OU4).

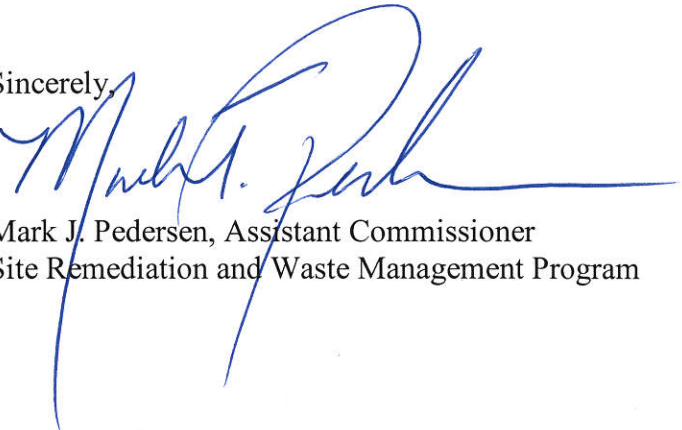
The Department concurs with the preferred alternative for sediment and surface water and with the preferred alternative for soil on those parcels that will not require a deed notice. However, because property owner consent to the implementation of a remedy that requires a cap and deed

notice has not been obtained, the Department cannot concur with the Proposed Plan. If property owner consent is obtained, the Department will concur on the Proposed Plan.

The Department looks forward to working with EPA on the issuance of the Record of Decision and remediation of the Sherwin-Williams/Hilliards Creek Superfund Site.

Should you wish to discuss this matter further please feel free to contact me at (609) 292-1250.

Sincerely,



Mark J. Pedersen, Assistant Commissioner
Site Remediation and Waste Management Program

CC: Lynn Vogel, NJDEP, BCM